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*Attorneys for Defendant Hatten Holdings, Inc. dba
Mountainside Fitness*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Chet Michael Wilson, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

Hatten Holdings, Inc. dba Mountainside
Fitness,

Defendant.

NO. 2:25-cv-01481-MTL

**STIPULATION AND JOINT
MOTION TO SUBSTITUTE
DEFENDANT**

The parties stipulate and jointly move the Court for an Order stating the following:

- Plaintiff may file a motion, which Defendant does not oppose, under which the entity Mountainside Fitness Acquisition, LLC will be substituted as the Defendant for current Defendant Hatten Holdings, Inc.; and

- Upon the foregoing substitution of defendant becoming effective, Mountainside Fitness Acquisition, LLC may have two weeks to respond to the Complaint naming Mountainside Fitness Acquisition, LLC as defendant.

- To the extent needed and to allow for the substitution of Mountainside Fitness Acquisition, LLC as defendant, Hatten Holdings, Inc. has an additional two weeks to respond to the Complaint in this matter. This is the second extension granted to Hatten

1 Holdings, Inc. to respond to the Complaint.

2 The parties reserve all claims, arguments, and defenses, and this Stipulation is not
3 intended to constitute a waiver of any such claims, arguments, and defenses.

4 RESPECTFULLY SUBMITTED this 26th day of June, 2025

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9 By: /s/ Anthony L. Paronich (w/permission) By: /s/ John M. O'Neal
10 Anthony I. Paronich John M. O'Neal
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11 *Attorneys for Plaintiff Chet Michael Wilson*

*Attorneys for Defendant Hatten Holdings,
12 Inc. dba Mountainside Fitness*

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15 **CERTIFICATE OF SERVICE**

16 I hereby certify that on June 26, 2025, I caused a true and correct copy of the
17 foregoing document to be filed with the Clerk of the Court through the U.S. District Court
18 Electronic Court Filing System, which caused notice of such filing to be sent electronically
19 to the registered attorneys of record.

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21 /s/ Debra L. Hitchens
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